

1 (Whereupon, the deposition began at ^
2 ^ a.m. ^ p.m.) 9:06.

3 VIDEOGRAPHER: We are now on the record for
4 the deposition of Dr. Jon Krosnick. The time is
5 9:306 a.m.. the day is May 1st, 2009. Counsel, 09:06AM
6 please identify yourselves for the Record?

7 MR. DEIHL: This is Colin Deihl on behalf
8 of Cargill.

9 MR. TRIPLETT: Eric Triplett on behalf of
10 Cargill. 09:06AM

11 MR. JONES: Tim Jones on behalf of Tyson.

12 MR. FREEMAN: Bruce Freeman for Simmons.

13 MR. PAGE: David Page for the State of
14 Oklahoma.

15 MS. MOLL: Ingrid Moll for the State of 09:06AM
16 Oklahoma.

17 WITNESS
18 having first been duly sworn to testify the truth,
19 the whole truth and nothing but the truth, testified
20 as follows:

21 DIRECT EXAMINATION

22 BY ^

23 Q Please state your full name.

24 A Jon Alexander Krosnick.

25 Q Have you ever been deposed before, Dr. 09:06AM

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1 **A** I didn't select it.

2 **Q** Who selected the recovery time?

3 **A** I don't know.

4 **Q** Do you know who selected the recovery time

5 without the alum treatment?

01:44PM

6 **A** No.

7 **Q** Were you involved in any discussions about the

8 selection of the recovery time for the alum

9 treatment?

10 **A** Yes.

01:44PM

11 **Q** Tell me about those discussions.

12 **A** I don't remember their content but I remember

13 that there are -- there's a number of recovery times

14 in the questionnaire and one of them is with the

15 scope instrument having to do with -- I guess two of

01:45PM

16 them are in the scope instrument, the natural

17 recovery time without alum and the accelerated

18 recovery time with alum in the scope instrument. I

19 have a memory of our discussing those times but I

20 have no recollection of the content of those

01:45PM

21 discussions.

22 **Q** Do you recall who you discussed it with?

23 **A** No.

24 **Q** Is it possible that the results of the CV

25 survey could have been different if the recovery

01:45PM

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1 times had been different in the proposed solution?

2 **A** Yes.

3 **Q** Is it possible that the results of the survey
4 could have been different if the negative impacts of
5 alum treatment had been included in the proposed
6 solution?

01:46PM

7 MS. MOLL: Objection, form.

8 **A** I don't know what negative impacts you're
9 referring to.

10 **Q** Are you aware of any literature regarding the
11 negative impacts of alum on the environment?

01:46PM

12 **A** No.

13 **Q** Did you ever review any documents regarding
14 the negative impact of alum treatments on the
15 environment?

01:46PM

16 **A** There may have been one or more documents
17 distributed to the team as E-mail attachments on
18 natural science finding on alum but I did not review
19 those documents carefully.

20 **Q** Why did you not review those documents
21 carefully?

01:47PM

22 **A** That was not part of what I was asked to do on
23 the project.

24 **Q** Dr. Krosnick, I've handed you what's been
25 marked as Deposition Exhibit No. 13, which is an

01:47PM

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